

WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037
TEL 202.783.4141
FAX 202.783.5851
www.wbklaw.com

May 1, 2006

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *American Cellular Corporation*
E911 Quarterly Report – CC Docket No. 94-102

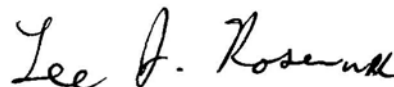
Dear Ms. Dortch:

American Cellular Corporation and its subsidiaries, by its attorneys, hereby submit the attached E911 Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.¹

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lawrence J. Movshin
Lee J. Rosen

Attachment

cc: Kris Monteith, Chief, Enforcement Bureau
Catherine W. Seidel, Acting Chief, Wireless Telecommunications Bureau
Tim Ryan, Acting Executive Director, APCO
Rob Martin, Executive Director, NENA
James R. Hobson, Counsel for NENA and NASNA
Steve Marzolf, President, NASNA

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002).

E911 Status – Quarterly Report

CC Docket No. 94-102

May 1, 2006

Summary of Report

Pursuant to the *Order to Stay* and the Commission's Public Notice dated June 6, 2003,¹ American Cellular Corporation ("ACC"), as a Tier II carrier, provides this E911 Quarterly Report ("Report"). The Report provides information on all Phase I and Phase II requests received by ACC, including the PSAP ID, Name, State, County, Implementation Phase, Air Interface, Date PSAP Request Made, Date PSAP Request Withdrawn, Invalid Request, Deployed, Date Deployed, Date Projected, Reasons and Comment. Detailed information regarding the requests is contained in the attached chart.

Phase I Service

ACC has received numerous requests for Phase I services and has activated service in all but a very few of these jurisdictions. ACC has received five new requests for Phase I service since the last quarterly filing from Eau Claire, Ashland, Rusk, Oneida and Clark Counties, WI. ACC has worked diligently with its third-party vendor Intrado, as well as the public safety community, in coordinating Phase I deployment. ACC remains committed to working with its vendors, the PSAPs, and state and local governments, in order to deploy Phase I services in the remaining jurisdictions as soon as possible.²

Phase II Service

A. Deployment Preparation

ACC is a mid-sized carrier serving predominantly rural and suburban markets in 9 states. ACC previously relied primarily upon a TDMA-based network of base stations and switching equipment, but has since completed overlaying its TDMA network with GSM/GPRS technology. ACC has worked with equipment vendors to deploy a network-based Phase II E911 solution, and all switch upgrades necessary to supply Phase II services have been completed. ACC has executed a contract with Andrew Corporation to provide the Position Determining Entity equipment for a hardware solution for E911 Phase II and has also executed a contract with Polaris Wireless to provide a software solution for E911 Phase II.

B. Phase II Requests

During the previous calendar quarter, ACC has continued to deploy the necessary software and hardware of the network-based Phase II solution from Polaris and/or Andrew in

¹ See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002) ("*Order to Stay*"); Public Notice, "Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation," DA 03-1902 (rel. June 6, 2003).

² Note that ACC acquired numerous Kentucky markets from another carrier, but was not provided the actual date of the PSAP request at the time it acquired the markets. ACC completed Phase I deployment to those markets some time ago, but ACC has inserted the 1/1/01 date as a proxy for the PSAP request date to address formatting issues raised by Commission staff.

response to pending requests. ACC has received five new requests for Phase II service since the last quarterly filing from Eau Claire, Ashland, Rusk, Oneida and Clark Counties, WI. The status of all requests is detailed in the attachment. To ensure that it may properly prioritize its E911-designated resources, ACC generally has requested each of these PSAPs to provide documentation pursuant to the *Richardson* criteria.³

C. Deployment Issues

ACC, as a rural carrier, has numerous markets that do not have the cell site density to provide accurate Phase II information via a network-based solution. ACC has recently employed a software-based solution from Polaris in the vast majority of its markets that ACC hopes will ultimately yield more reliable results in these difficult markets. However, regardless of vendor, ACC faces accuracy challenges due to cell site configuration problems, especially in markets with only one or two cell sites. As previously reported in the last quarterly report, ACC has learned from the vendor that in the Polaris-served markets E911 Phase II service will not be available to subscribers using analog service. ACC continues to review other alternatives to provide E911 Phase II to these subscribers.

For ACC's hardware-based solution, in order to meet the Commission's network-based accuracy requirements, Andrew Corporation may need to install Angle-of-Arrival ("AOA") antennas at certain cell sites in addition to the Time Difference of Arrival ("TDOA") equipment that will be installed in individual cell sites. ACC has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

ACC brought similar matters to the Commission's attention in its September 4, 2001 waiver request.⁴ Accordingly, if necessary, ACC may avail itself of further waiver procedures to account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.⁵

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSA.

³ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems, Petition of City of Richardson*, CC Docket No. 94-102, *Order*, 16 FCC Rcd 18982, 18986-87 (2001).

⁴ See ACC Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission's Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

⁵ See *Order to Stay*, 17 FCC Rcd at 14853.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
2964	Laurel County E9-1-1	KY	Laurel/ London	1	TDMA/GSM	11/16/2000		N	Y	11/28/2001			
2964	Laurel County E9-1-1	KY	Laurel/ London	2	TDMA/GSM	6/30/2004		N	Y	11/16/2005			
2868	Barren-Metcalf E9-1-1	KY	Barren and Metcalfe	1	TDMA/GSM	1/1/2001		N	Y	11/27/2001			
2868	Barren-Metcalf E9-1-1	KY	Barren and Metcalfe	2	TDMA/GSM	5/4/2004		N	Y	07/27/2005			Due to the isolation of the only site in Metcalfe County from other neighboring sites, the Phase II solution continues to experience technical difficulties, and the network very often reverts back to Phase I when a call is made.
3001	Nelson County Sheriffs Department	KY	Nelson	1	TDMA/GSM	1/1/2001		N	Y	11/27/2001			
3001	Nelson County Sheriffs Department	KY	Nelson	2	TDMA/GSM	10/11/2004		N	Y	07/14/2005			
3021	Rockcastle County 9-1-1	KY	Rockcastle	1	TDMA/GSM	1/1/2001		N	Y	09/24/2001			
3021	Rockcastle County 9-1-1	KY	Rockcastle	2	TDMA/GSM	10/11/2004		N	Y	06/28/2005			
2993	Monticello-Wayne County Dispatch Center	KY	Wayne	1	TDMA/GSM	1/1/2001		N	Y	09/24/2001			
2993	Monticello-Wayne County Dispatch Center	KY	Wayne	2	TDMA/GSM	10/11/2004		N	Y	07/14/2005			
2987	McCreary County 9-1-1	KY	McCreary	1	TDMA/GSM	1/1/2001		N	Y	09/24/2001			
2987	McCreary County 9-1-1	KY	McCreary	2	TDMA/GSM	10/11/2004		N	Y	06/21/2005			Due to the isolation of this site from other neighboring sites, the Phase II solution continues to experience technical difficulties, and the network very often reverts back to Phase I when a call is made.
2986	Maysville Emergency Services	KY	Mason	1	TDMA/GSM	1/1/2001		N	Y	08/29/2001			
2986	Maysville Emergency Services	KY	Mason	2	TDMA/GSM	6/10/2004		N	Y	07/12/2005			
2923	Hart County Dispatch	KY	Hart	1	TDMA/GSM	1/1/2001		N	Y	08/21/2001			
2923	Hart County Dispatch	KY	Hart	2	TDMA/GSM	10/11/2004		N	Y	07/27/2005			
2898	Danville-Boyle County 9-1-1 Center	KY	Boyle	1	TDMA/GSM	8/17/2000		N	Y	08/14/2001			
2898	Danville-Boyle County 9-1-1 Center	KY	Boyle	2	TDMA/GSM	6/15/2004		N	Y	06/21/2005			
2869	Bath County Dispatch	KY	Bath	1	TDMA/GSM	1/1/2001		N	Y	06/05/2001			
2869	Bath County Dispatch	KY	Bath	2	TDMA/GSM	10/11/2004		N	Y	07/21/2005			
2970	Lewis County Detention Center	KY	Lewis	1	TDMA/GSM	1/1/2001		N	Y	06/05/2001			
2970	Lewis County Detention Center	KY	Lewis	2	TDMA/GSM	10/11/2004		N	Y	07/06/2005			
2990	Menifee County Fire Dispatch	KY	Menifee	1	TDMA/GSM	1/1/2001		N	Y	05/31/2001			
2990	Menifee County Fire Dispatch	KY	Menifee	2	TDMA/GSM	10/11/2004		N	Y	07/07/2005			
2972	Lincoln County 9-1-1	KY	Lincoln	1	TDMA/GSM	1/1/2001		N	Y	05/31/2001			
2972	Lincoln County 9-1-1	KY	Lincoln	2	TDMA/GSM	10/11/2004		N	Y	07/19/2005			
3023	Russell County Dispatch	KY	Russell	1	TDMA/GSM	1/1/2001		N	Y	05/18/2001			
3023	Russell County Dispatch	KY	Russell	2	TDMA/GSM	10/11/2004		N	Y	07/14/2005			
2879	Burkesville Police Department	KY	Cumberland	1	TDMA/GSM	1/1/2001		N	Y	05/18/2001			
2879	Burkesville Police Department	KY	Cumberland	2	TDMA/GSM	10/11/2004		N	Y	07/26/2005			
2860	Albany Police Department	KY	Clinton	1	TDMA/GSM	1/1/2001		N	Y	05/18/2001			
2860	Albany Police Department	KY	Clinton	2	TDMA/GSM	10/11/2004		N	Y	07/26/2005			
3029	Spencer County	KY	Spencer	1	TDMA/GSM	1/1/2001		N	Y	08/09/2001			
3029	Spencer County	KY	Spencer	2	TDMA/GSM	10/11/2004		N	Y	06/28/2005			
2997	Mt Sterling Police Department	KY	Montgomery	1	TDMA/GSM	1/1/2001		N	Y	09/19/2001			
2997	Mt Sterling Police Department	KY	Montgomery	2	TDMA/GSM	7/14/2005		N	Y	07/19/2005			
2979	Madison County E9-1-1	KY	Madison	1	TDMA/GSM	8/11/1998		N	Y	07/13/2001			
2979	Madison County E9-1-1	KY	Madison	2	TDMA/GSM	5/26/2004		N	Y	07/19/2005			
2994	Morehead Police Department	KY	Morehead/Rowan	1	TDMA/GSM	11/9/2001		N	Y	12/07/2001			
2994	Morehead Police Department	KY	Morehead/Rowan	2	TDMA/GSM	05/21/2002		N	Y	07/19/2005			
2859	Adair County 9-1-1 Center	KY	Adair	1	TDMA/GSM	7/2/2001		N	Y	12/06/2001			
2859	Adair County 9-1-1 Center	KY	Adair	2	TDMA/GSM	3/24/2004		N	Y	07/20/2005			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
2992	Monroe County Ambulance and 9-1-1 Center	KY	Monroe	1	TDMA/GSM	1/4/2001		N	N	03/21/2002	TBD	2	As noted, Phase I was fully deployed on March 21, 2002. While testing to deploy Phase II, ACC determined that the PSAP's actions and technical limitations with the PSAP's equipment had the unintended effect of preventing PSAP from receiving Phase I data at its equipment. Parties are consulting to correct this problem.
2992	Monroe County Ambulance and 9-1-1 Center	KY	Monroe	2	TDMA/GSM	5/20/2004		N	N		TBD	2	During Phase II testing, ACC and the PSAP encountered technical difficulties. ACC determined that PSAP actions and technical limitations have prevented PSAP from receiving Phase II data at its equipment. Prior to encountering technical problems, PSAP agreed in writing to alternative deployment schedule. Parties are working together to correct this problem.
2884	Campbellsville 9-1-1 Communications	KY	Taylor	1	TDMA/GSM	12/4/2000		N	Y	03/22/2002			
2884	Campbellsville 9-1-1 Communications	KY	Taylor	2	TDMA/GSM	4/15/2004		N	Y	03/02/2006			
2922	Harrodsburg Police Department	KY	Mercer	1	TDMA/GSM	4/30/2001		N	Y	05/01/2002			
2922	Harrodsburg Police Department	KY	Mercer	2	TDMA/GSM	3/23/2004		N	Y	07/14/2005			
3017	Pulaski County 9-1-1	KY	Pulaski	1	TDMA/GSM	7/17/2000		N	Y	12/05/2001			
3017	Pulaski County 9-1-1	KY	Pulaski	2	TDMA/GSM	6/21/2004		N	Y	11/18/2005			
2864	Anderson County Ambulance Service	KY	Anderson	1	TDMA/GSM	2/28/2001		N	Y	02/18/2002			
2920	Hardin County 9-1-1	KY	Hardin	1	TDMA/GSM	7/6/2000		N	Y	12/20/2001			
2920	Hardin County 9-1-1	KY	Hardin	2	TDMA/GSM	5/28/2004		N	Y	07/14/2005			
2963	Larue County Dispatch	KY	Larue	1	TDMA/GSM	7/17/2000		N	Y	12/19/2001			
2963	Larue County Dispatch	KY	Larue	2	TDMA/GSM	6/29/2004		N	Y	08/02/2005			
2916	Greensburg Police Department	KY	Green	1	TDMA/GSM	12/12/2000		N	Y	12/11/2001			
2916	Greensburg Police Department	KY	Green	2	TDMA/GSM	7/15/2003		N	Y	07/19/2005			
2890	Casey County Dispatch	KY	Casey	1	TDMA/GSM	1/1/2001		N	Y	12/14/2001			
2890	Casey County Dispatch	KY	Casey	2	TDMA/GSM	10/11/2004		N	Y	07/14/2005			Due to the isolation of this site from other neighboring sites, the Phase II solution continues to experience technical difficulties, and the network very often reverts back to Phase I when a call is made.
2875	Bracken County Dispatch	KY	Bracken	1	TDMA/GSM	1/1/2001		N	Y	04/19/2002			
2875	Bracken County Dispatch	KY	Bracken	2	TDMA/GSM	10/11/2004		Y	Y	09/20/2005			
2875	Bracken County Dispatch	KY	Bracken	2	TDMA/GSM	1/31/2005		N	Y	09/20/2005			
2886	Carlisle Police Department	KY	Nicholas	1	TDMA/GSM	1/1/2001		N	Y	04/19/2002			
2886	Carlisle Police Department	KY	Nicholas	2	TDMA/GSM	10/11/2004		N	Y	07/21/2005			
3020	Robertson County EMS	KY	Robertson	1	TDMA/GSM	1/1/2001		N	Y	04/23/2002			
3020	Robertson County EMS	KY	Robertson	2	TDMA/GSM	10/11/2004		Y	N		N/A		ACC does not have any coverage in this county.
3030	Springfield-Washington County E9-1-1	KY	Washington	2	TDMA/GSM	3/31/2004		N	Y	11/03/2005			
2962	Lancaster Garrard 9-1-1	KY	Garrard	2	TDMA/GSM	6/9/2004		N	Y	03/29/2006			
2907	Fleming County Dispatch	KY	Fleming	2	TDMA/GSM	6/30/2004		N	Y	09/29/2005			
2967	Lebanon Police Department	KY	Marion	2	TDMA/GSM	10/11/2004		N	Y	06/29/2005			
2931	Jackson County 9-1-1	KY	Jackson	2	TDMA/GSM	10/11/2004		Y	N		N/A		County not located in ACC service area.
7567	Marion County Central Communications	WV	Marion	1	TDMA/GSM	6/1/2000		N	Y	04/11/2001			
7567	Marion County Central Communications	WV	Marion	2	TDMA/GSM	9/2/2003		N	Y	08/23/2005			
7581	Morgantown Police Department	WV	Monongalia	1	TDMA/GSM	6/1/2000		N	Y	03/30/2001			
7581	Morgantown Police Department	WV	Monongalia	2	TDMA/GSM	9/2/2003		N	Y	08/23/2005			
7559	Harrison County Bureau of Emergency Services	WV	Harrison	1	TDMA/GSM	6/1/2000		N	Y	03/30/2001			
7559	Harrison County Bureau of Emergency Services	WV	Harrison	2	TDMA/GSM	9/2/2003		N	Y	08/24/2005			
7589	Preston County Communications Center	WV	Preston	1	TDMA/GSM	6/1/2000		N	Y	04/11/2001			
7589	Preston County Communications Center	WV	Preston	2	TDMA/GSM	9/2/2003		N	Y	08/22/2005			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
7596	Taylor County Emergency Services	WV	Taylor	1	TDMA/GSM	6/1/2000		N	Y	08/27/2002			
7596	Taylor County Emergency Services	WV	Taylor	2	TDMA/GSM	9/2/2003		N	Y	08/23/2005			
7608	Wetzel County Emergency Communications	WV	Wetzel	1	TDMA/GSM	4/18/2003		N	Y	12/03/2003			
7605	West Union Fire Department (CCI)	WV	Doddridge	1	TDMA/GSM	6/30/2003		N	Y	11/14/2003			
7605	West Union Fire Department (CCI)	WV	Doddridge	2	TDMA/GSM	3/18/2004		N	Y	10/31/2005			Due to the isolation of this site from other neighboring sites, the Phase II solution continues to experience technical difficulties, and the network very often reverts back to Phase I when a call is made.
7593	Ritchie County (CCI)	WV	Ritchie	1	TDMA/GSM	6/30/2003		N	Y	11/14/2003			
7593	Ritchie County (CCI)	WV	Ritchie	2	TDMA/GSM	3/18/2004		N	Y	10/31/2005			Due to the isolation of this site from other neighboring sites, the Phase II solution continues to experience technical difficulties, and the network very often reverts back to Phase I when a call is made.
7543	Barbour County Communications Center	WV	Barbour	1	TDMA/GSM	6/8/2004		N	Y	07/19/2005			
7564	Lewis County 9-1-1	WV	Lewis	1	TDMA/GSM	10/13/2004		N	Y	07/19/2005			
7564	Lewis County 9-1-2	WV	Lewis	2	TDMA/GSM	10/13/2004		N	Y	10/31/2005			
7553	Gilmer County Sheriffs Department	WV	Gilmer	1	TDMA/GSM	10/13/2004		N	Y	07/19/2005			
7553	Gilmer County Sheriffs Department	WV	Gilmer	2	TDMA/GSM	10/13/2004		N	Y	10/31/2005			Due to the isolation of this site from other neighboring sites, the Phase II solution continues to experience technical difficulties, and the network very often reverts back to Phase I when a call is made.
3456	Marquette County Central Dispatch	MI	Marquette	1	TDMA/GSM	4/30/2001		N	Y	02/21/2002			
3456	Marquette County Central Dispatch	MI	Marquette	2	TDMA	1/28/2004		N	Y	07/07/2005			
3456	Marquette County Central Dispatch	MI	Marquette	2	GSM	1/28/2004		N	Y	08/11/2005			
3369	Dickinson County Sheriffs Office	MI	Dickinson	1	TDMA/GSM	4/30/2001		N	Y	02/21/2002			
3369	Dickinson County Sheriffs Office	MI	Dickinson	2	TDMA	1/27/2004		N	Y	07/12/2005			
3369	Dickinson County Sheriffs Office	MI	Dickinson	2	GSM	1/27/2004		N	Y	07/14/2005			
3464	Menominee County Central Dispatch	MI	Menominee	1	TDMA/GSM	4/30/2001		N	Y	02/25/2002			
3464	Menominee County Central Dispatch	MI	Menominee	2	TDMA	1/29/2004		N	Y	07/12/2005			
3464	Menominee County Central Dispatch	MI	Menominee	2	GSM	1/29/2004		N	Y	07/14/2005			
3422	Iron County 9-1-1	MI	Iron	1	TDMA/GSM	4/30/2001		N	Y	02/27/2002			
3422	Iron County 9-1-2	MI	Iron	2	TDMA	1/20/2004		N	Y	07/12/2005			
3422	Iron County 9-1-2	MI	Iron	2	GSM	1/20/2004		N	Y	07/14/2005			
3516	Ontonagon County Sheriffs Office	MI	Ontonagon	1	TDMA/GSM	4/30/2001		N	Y	10/02/2003			
3516	Ontonagon County Sheriffs Office	MI	Ontonagon	2	TDMA	4/23/2004		N	Y	06/23/2005			
3516	Ontonagon County Sheriffs Office	MI	Ontonagon	2	GSM	4/23/2004		N	Y	07/14/2005			
3433	Keweenaw County Sheriffs Office	MI	Keweenaw	1	TDMA/GSM	4/30/2001		N	Y	09/30/2003			
3433	Keweenaw County Sheriffs Office	MI	Keweenaw	2	TDMA	11/15/2004		N	Y	07/17/2005			
3433	Keweenaw County Sheriffs Office	MI	Keweenaw	2	GSM	11/15/2004		N	Y	07/14/2005			
3413	Houghton County Central Dispatch	MI	Houghton	1	TDMA/GSM	4/30/2001		N	Y	03/28/2002			
3413	Houghton County Central Dispatch	MI	Houghton	2	TDMA	1/6/2004		N	Y	07/12/2005			
3413	Houghton County Central Dispatch	MI	Houghton	2	GSM	1/6/2004		N	Y	07/14/2005			
3319	Baraga County Sheriff	MI	Baraga	1	TDMA/GSM	4/30/2001		N	Y	10/02/2003			
3319	Baraga County Sheriff	MI	Baraga	2	TDMA/GSM	9/19/2003		N	Y	07/12/2005			
3319	Baraga County Sheriff	MI	Baraga	2	TDMA/GSM	9/19/2003		N	Y	07/14/2005			
3393	Gogebic County Sheriffs Office	MI	Gogebic	1	TDMA/GSM	2/24/2003		N	Y	12/03/2003			
3393	Gogebic County Sheriffs Office	MI	Gogebic	2	TDMA	2/25/2004		Y	Y	07/12/2005			
3393	Gogebic County Sheriffs Office	MI	Gogebic	2	GSM	2/25/2004		N	Y	07/18/2005			
3596	Aitkin County Sheriffs Office	MN	Aitkin	1	TDMA	1/31/2001		N	Y	03/20/2003			
3596	Aitkin County Sheriffs Office	MN	Aitkin	1	GSM	1/31/2001		N	Y	11/22/2004			
3596	Aitkin County Sheriffs Office	MN	Aitkin	2	TDMA/GSM	3/1/2002		N	Y	08/19/2005			
3600	Becker County Sheriffs Office	MN	Becker	1	TDMA	1/31/2001		N	Y	02/12/2003			
3600	Becker County Sheriffs Office	MN	Becker	1	GSM	1/31/2001		N	Y	11/22/2004			
3600	Becker County Sheriffs Office	MN	Becker	2	TDMA/GSM	3/1/2002		N	Y	08/24/2005			
3601	Beltrami County Law Enforcement Center	MN	Beltrami	1	TDMA	1/31/2001		N	Y	07/10/2002			
3601	Beltrami County Law Enforcement Center	MN	Beltrami	1	GSM	1/31/2001		N	Y	11/22/2004			
3601	Beltrami County Law Enforcement Center	MN	Beltrami	2	TDMA/GSM	3/1/2002		N	Y	08/18/2005			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3610	Carlton County Sheriffs Office	MN	Carlton	1	TDMA	1/31/2001		N	Y	03/24/2004			
3610	Carlton County Sheriffs Office	MN	Carlton	1	GSM	1/31/2001		N	Y	11/23/2004			
3610	Carlton County Sheriffs Office	MN	Carlton	2	TDMA/GSM	3/1/2002		N	Y	08/29/2005			
3612	Cass County Sheriffs Office	MN	Cass	1	TDMA	1/31/2001		N	Y	07/10/2002			
3612	Cass County Sheriffs Office	MN	Cass	1	GSM	1/31/2001		N	Y	11/22/2004			
3612	Cass County Sheriffs Office	MN	Cass	2	TDMA/GSM	3/1/2002		N	Y	08/29/2005			
3620	Crow Wing County Sheriffs Office	MN	Crow Wing	1	TDMA	1/31/2001		N	Y	03/17/2003			
3620	Crow Wing County Sheriffs Office	MN	Crow Wing	1	GSM	1/31/2001		N	Y	11/22/2004			
3620	Crow Wing County Sheriffs Office	MN	Crow Wing	2	TDMA/GSM	3/1/2002		N	Y	08/29/2005			
3623	Douglas County Sheriffs Office	MN	Douglas	1	TDMA	1/31/2001		N	Y	06/27/2002			
3623	Douglas County Sheriffs Office	MN	Douglas	1	GSM	1/31/2001		N	Y	11/22/2004			
3623	Douglas County Sheriffs Office	MN	Douglas	2	TDMA/GSM	3/1/2002		N	Y	08/19/2005			
3633	Grant County Sheriffs Office	MN	Grant	1	TDMA	1/31/2001		N	Y	07/08/2002			
3633	Grant County Sheriffs Office	MN	Grant	1	GSM	1/31/2001		N	Y	11/23/2004			
3633	Grant County Sheriffs Office	MN	Grant	2	TDMA/GSM	3/1/2002		N	Y	08/18/2005			
3640	Hubbard County Sheriffs Office	MN	Hubbard	1	TDMA	1/31/2001		N	Y	03/23/2004			
3640	Hubbard County Sheriffs Office	MN	Hubbard	1	GSM	1/31/2001		N	Y	11/22/2004			
3640	Hubbard County Sheriffs Office	MN	Hubbard	2	TDMA/GSM	3/1/2002		N	Y	08/23/2005			
3643	Itasca County Sheriffs Office	MN	Itasca	1	TDMA	1/31/2001		N	Y	07/12/2002			
3643	Itasca County Sheriffs Office	MN	Itasca	1	GSM	1/31/2001		N	Y	11/22/2004			
3643	Itasca County Sheriffs Office	MN	Itasca	2	TDMA/GSM	3/1/2002		N	Y	08/24/2005			
3645	Kanabec County Sheriffs Office	MN	Kanabec	1	TDMA	1/31/2001		N	Y	07/03/2002			
3645	Kanabec County Sheriffs Office	MN	Kanabec	1	GSM	1/31/2001		N	Y	05/19/2005			
3645	Kanabec County Sheriffs Office	MN	Kanabec	2	TDMA/GSM	3/1/2002		N	Y	08/22/2005			
3648	Koochiching County Sheriffs Office	MN	Koochiching	1	TDMA	1/31/2001		N	Y	03/23/2004			
3648	Koochiching County Sheriffs Office	MN	Koochiching	1	GSM	1/31/2001		N	Y	11/22/2004			
3648	Koochiching County Sheriffs Office	MN	Koochiching	2	TDMA/GSM	3/1/2002		N	Y	08/25/2005			
3650	Lake County Sheriffs Office	MN	Lake	1	TDMA	1/31/2001		N	Y	04/30/2002			
3650	Lake County Sheriffs Office	MN	Lake	1	GSM	1/31/2001		N	Y	11/30/2004			
3650	Lake County Sheriffs Office	MN	Lake	2	TDMA/GSM	3/1/2002		N	Y	08/24/2005			
3667	Millie Lacs County Sheriffs Office	MN	Millie Lacs	1	TDMA	1/31/2001		N	Y	02/18/2003			
3667	Millie Lacs County Sheriffs Office	MN	Millie Lacs	1	GSM	1/31/2001		N	Y	11/22/2004			
3667	Millie Lacs County Sheriffs Office	MN	Millie Lacs	2	TDMA/GSM	3/1/2002		N	Y	08/17/2005			
3685	Morrison County Sheriffs Office	MN	Morrison	1	TDMA	1/31/2001		N	Y	03/18/2003			
3685	Morrison County Sheriffs Office	MN	Morrison	1	GSM	1/31/2001		N	Y	11/22/2004			
3685	Morrison County Sheriffs Office	MN	Morrison	2	TDMA/GSM	3/1/2002		N	Y	08/22/2005			
3695	Otter Tail County Sheriffs Office	MN	Otter Tail	1	TDMA	1/31/2001		N	Y	06/27/2002			
3695	Otter Tail County Sheriffs Office	MN	Otter Tail	1	GSM	1/31/2001		N	Y	11/22/2004			
3695	Otter Tail County Sheriffs Office	MN	Otter Tail	2	TDMA/GSM	3/1/2002		N	Y	08/18/2005			
3698	Pine County Sheriffs Office	MN	Pine	1	TDMA	1/31/2001		N	Y	06/27/2002			
3698	Pine County Sheriffs Office	MN	Pine	1	GSM	1/31/2001		N	Y	11/30/2004			
3698	Pine County Sheriffs Office	MN	Pine	2	TDMA/GSM	3/1/2002		N	Y	08/29/2005			
3701	Pope County Sheriffs Office	MN	Pope	1	TDMA	1/31/2001		N	Y	02/19/2003			
3701	Pope County Sheriffs Office	MN	Pope	1	GSM	1/31/2001		N	Y	11/22/2004			
3701	Pope County Sheriffs Office	MN	Pope	2	TDMA/GSM	3/1/2002		N	Y	08/18/2005			
3716	St Louis County Emergency Communications	MN	St Louis North	1	TDMA	1/31/2001		N	Y	02/13/2003			
3716	St Louis County Emergency Communications	MN	St Louis North	1	GSM	1/31/2001		N	Y	11/30/2004			
3716	St Louis County Emergency Communications	MN	St Louis North	2	TDMA/GSM	3/1/2002		N	Y	09/02/2005			
3717	St Louis County Emergency Communications	MN	St Louis South	1	TDMA	1/31/2001		N	Y	02/17/2003			
3717	St Louis County Emergency Communications	MN	St Louis South	1	GSM	1/31/2001		N	Y	11/22/2004			
3717	St Louis County Emergency Communications	MN	St Louis South	2	TDMA/GSM	3/1/2002		N	Y	09/02/2005			
3723	Stevens County Sheriffs Office	MN	Stevens	1	TDMA	1/31/2002		N	Y	09/23/2003			
3723	Stevens County Sheriffs Office	MN	Stevens	1	GSM	1/31/2002		N	Y	11/22/2004			
3723	Stevens County Sheriffs Office	MN	Stevens	2	TDMA/GSM	3/1/2002		N	Y	08/23/2005			
3724	Swift County Sheriffs Office	MN	Swift	1	TDMA	1/31/2001		N	Y	05/06/2002			
3724	Swift County Sheriffs Office	MN	Swift	1	GSM	1/31/2001		N	Y	11/22/2004			
3724	Swift County Sheriffs Office	MN	Swift	2	TDMA/GSM	3/1/2002		N	Y	08/23/2005			
3726	Todd County Sheriffs Office	MN	Todd	1	TDMA	1/31/2001		N	Y	03/17/2003			
3726	Todd County Sheriffs Office	MN	Todd	1	GSM	1/31/2001		N	Y	11/22/2004			
3726	Todd County Sheriffs Office	MN	Todd	2	TDMA/GSM	3/1/2002		N	Y	08/23/2005			
3730	Wadena County Sheriffs Office	MN	Wadena	1	TDMA	1/31/2001		N	Y	05/06/2002			
3730	Wadena County Sheriffs Office	MN	Wadena	1	GSM	1/31/2001		N	Y	11/22/2004			
3730	Wadena County Sheriffs Office	MN	Wadena	2	TDMA/GSM	3/1/2002		N	Y	08/17/2005			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3737	Wilkin County Law Enforcement Center	MN	Wilkin	1	TDMA	1/31/2001		N	Y	02/12/2003			
3737	Wilkin County Law Enforcement Center	MN	Wilkin	1	GSM	1/31/2001		N	Y	11/22/2004			
3737	Wilkin County Law Enforcement Center	MN	Wilkin	2	TDMA/GSM	3/1/2002		N	Y	08/18/2005			
5369	Hocking County 9-1-1	OH	Hocking	1	TDMA/GSM	3/1/2002		N	Y	06/18/2002			
5369	Hocking County 9-1-1	OH	Hocking	2	TDMA/GSM	3/1/2002		Y	Y	09/29/2005			Due to the isolation of this site from other neighboring sites, the Phase II solution continues to experience technical difficulties, and the network very often reverts back to Phase I when a call is made.
2788	Montgomery County Sheriffs Office	KS	Montgomery	1	TDMA/GSM	7/15/2002		N	Y	11/07/2003			
2788	Montgomery County Sheriffs Office	KS	Montgomery	2	TDMA/GSM	7/15/2002		N	Y	08/30/2005			
5197	Schoharie County Sheriffs Department	NY	Schoharie	1	TDMA	11/4/2002		N	Y	10/03/2003			
5197	Schoharie County Sheriffs Department	NY	Schoharie	1	GSM	11/4/2002		N	Y	10/20/2005			
5197	Schoharie County Sheriffs Department	NY	Schoharie	2	TDMA/GSM	11/4/2002	9/20/2004	Y	N		N/A		Initial PSAP request withdrawn.
5197	Schoharie County Sheriffs Department	NY	Schoharie	2	TDMA	9/20/2004		N	Y	05/24/2005			
5197	Schoharie County Sheriffs Department	NY	Schoharie	2	GSM	9/20/2004		N	Y	10/20/2005			
5173	Otsego County Public Safety Communication	NY	Otsego	1	TDMA/GSM	02/20/2003		N	Y	09/03/2003			
5173	Otsego County Public Safety Communication	NY	Otsego	2	GSM	02/20/2003		N	Y	05/24/2005			
5173	Otsego County Public Safety Communication	NY	Otsego	2	TDMA	02/20/2003		N	Y	07/19/2005			
5220	Ulster County Emergency Communication C	NY	Ulster	1	TDMA/GSM	02/07/2003		N	Y	05/28/2004			
5220	Ulster County Emergency Communication C	NY	Ulster	2	GSM	07/29/2004		N	Y	04/19/2005			
5220	Ulster County Emergency Communication C	NY	Ulster	2	TDMA	07/29/2004		N	Y	07/20/2005			ACC is adding additional sites to its current deployment and continues to work to improve accuracy.
9512	Orange County Emergency Services	NY	Orange	1	TDMA/GSM	06/08/2004		N	Y	04/05/2005			
9512	Orange County Emergency Services	NY	Orange	2	TDMA/GSM	10/11/2005		N	Y	04/10/2006			
5068	Dutchess County Sheriffs Department	NY	Dutchess	1	TDMA/GSM	06/16/2003		N	Y	08/12/2004			
5068	Dutchess County Sheriffs Department	NY	Dutchess	2	TDMA/GSM	07/12/2005		N	Y	12/08/2005			
5129	Monticello	NY	Sullivan	1	TDMA/GSM	11/29/2005		N	N		05/29/2006		
5129	Monticello	NY	Sullivan	2	TDMA/GSM	11/29/2005		N	N		05/29/2006		
7458	Marinette County	WI	Marinette	1	TDMA/GSM	01/18/2005		N	N		TBD	2	PSAP communicated to ACC that PSAP equipment would not be installed until March 31, 2006. On April 12, 2006, ACC received a letter from PSAP indicating that county is not ready to receive E911 information at this time and expect to be capable in late 2006. ACC will coordinate with PSAP once PSAP installs necessary equipment.
7458	Marinette County	WI	Marinette	2	TDMA/GSM	01/18/2005		N	N		TBD	2	See Marinette, WI Phase I.
7455	Lincoln County Sheriff's Department	WI	Lincoln	1	TDMA/GSM	01/19/2005		N	Y	01/25/2006			
7455	Lincoln County Sheriff's Department	WI	Lincoln	2	TDMA/GSM	01/19/2005		N	Y	01/25/2006			
7524	Vilas County Sheriffs Department	WI	Vilas	1	TDMA/GSM	04/14/2005		N	Y	01/24/2006			
7524	Vilas County Sheriffs Department	WI	Vilas	2	TDMA/GSM	04/14/2005		N	Y	01/24/2006			
7503	Sawyer County Sheriffs Department	WI	Sawyer	1	TDMA/GSM	07/18/2005		N	Y	04/20/2006			PSAP had agreed in writing to an alternative deployment date.
20/06	Sawyer County Sheriffs Department	WI	Sawyer	2	TDMA/GSM	07/18/2005		N	Y	04/20/2006			PSAP had agreed in writing to an alternative deployment date.
7391	Barron County Sheriffs Department	WI	Barron	1	TDMA/GSM	12/02/2005		N	N		06/02/2006		
7391	Barron County Sheriffs Department	WI	Barron	2	TDMA/GSM	12/02/2005		N	N		06/02/2006		
7406	Chippewa County Sheriffs Office	WI	Chippewa	1	TDMA/GSM	11/07/2005		N	N		05/07/2006		
7406	Chippewa County Sheriffs Office	WI	Chippewa	2	TDMA/GSM	11/07/2005		N	N		05/07/2006		
7457	Marathon County Sheriffs Department	WI	Marathon	1	TDMA/GSM	11/02/2005		N	N		05/02/2006		
7457	Marathon County Sheriffs Department	WI	Marathon	2	TDMA/GSM	11/02/2005		N	N		05/02/2006		
7488	Polk County Sheriffs Department	WI	Polk	1	TDMA/GSM	01/11/2006		N	N		06/11/2006		
7488	Polk County Sheriffs Department	WI	Polk	2	TDMA/GSM	01/11/2006		N	N		06/11/2006		
7501	Rusk County Sheriffs Department	WI	Rusk	1	TDMA/GSM	02/15/2006		N	N		08/15/2006		
7501	Rusk County Sheriffs Department	WI	Rusk	2	TDMA/GSM	02/15/2006		N	N		08/15/2006		
7409	City of Eau Claire	WI	Eau Claire	1	TDMA/GSM	02/23/2006		N	N		08/23/2006		
7409	City of Eau Claire	WI	Eau Claire	2	TDMA/GSM	02/23/2006		N	N		08/23/2006		

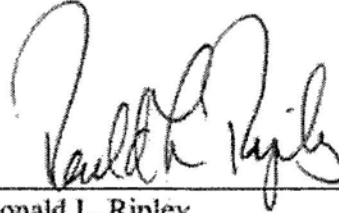
PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
7388	Ashland County 9-1-1 Communications Cent	WI	Ashland	1	TDMA/GSM	02/01/2006		N	N		08/01/2006		
7388	Ashland County 9-1-1 Communications Cent	WI	Ashland	2	TDMA/GSM	02/01/2006		N	N		08/01/2006		
7410	Clark County Sheriffs Department	WI	Clark	1	TDMA/GSM	03/17/2006		N	N		09/17/2006		
7410	Clark County Sheriffs Department	WI	Clark	2	TDMA/GSM	03/17/2006		N	N		09/17/2006		
7481	Oneida County Sheriffs Department	WI	Oneida	1	TDMA/GSM	04/25/2006		N	N		10/25/2006		
7481	Oneida County Sheriffs Department	WI	Oneida	2	TDMA/GSM	04/25/2006		N	N		10/25/2006		

AFFIDAVIT OF RONALD L. RIPLEY

I, Ronald L. Ripley, do hereby declare that the following is true and accurate:

I am an officer of American Cellular Corporation ("ACC").

I have reviewed the ACC E911 Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.

A handwritten signature in dark ink, appearing to read 'Ronald L. Ripley', written over a horizontal line.

Ronald L. Ripley
Senior Vice President & General Counsel

Executed on:

April 28, 2006

CERTIFICATE OF SERVICE

I, LaVon E. Nickens, hereby certify that on the 1st day of May 2006, copies of the foregoing "E911 Quarterly Report" have been served by first class mail, postage prepaid to the following:

Kris Monteith*
Bureau Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W., Room 7C-485
Washington, D.C. 20554

Tim Ryan
Acting Executive Director, APCO
APCO International, Inc.
World Headquarters
351 N. Williamson Blvd.
Daytona Beach, FL 32114

Rob Martin
Executive Director
National Emergency Number Association
4350 North Fairfax Drive
Suite 750
Arlington, VA 22203

Catherine W. Seidel*
Acting Bureau Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Steve Marzolf
President, NASNA
VITA/Divs. Public Safety Cmn.
110 S. 7th St., Su. 100
Richmond, VA 23219-3931

James R. Hobson
Counsel for NENA and NASNA
Miller & Van Eaton
1155 Connecticut Avenue, N.W.
Washington, D.C. 20036

/s/ LaVon E. Nickens
LaVon E. Nickens

* *via hand delivery*